

From: Mia, Marcia

Sent: Thursday, August 01, 2019 10:06 PM

To: Fried, Gregory; Chapman, Apple

CC: Scinta, Robert

Subject: FW: Applicability of NSPS Subpart 0000a to gas pipeline mainline valves

Attachments: Kinder_Morgan_MLV_mbm.docx; KM_MLV_Applicability_region
4_BIWeekly08_08.docx; Thomaston_EPA-0000a-RecordsRequest_20190710_Final.pdf

FYI, **Ex. 5 Deliberative Process (DP)**

Ex. 5 Deliberative Process (DP)

M

Marcia B Mia

Air Branch

Office of Compliance

2227A WJCS

U.S. Environmental Protection Agency

202-564-7042

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From: McNeal, Dave <Mcneal.Dave@epa.gov>

Sent: Thursday, July 25, 2019 1:07 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: RE: Applicability of NSPS Subpart 0000a to gas pipeline mainline valves

Hi Karen,

Thanks for the quick response. I'll draft a response to Kinder Morgan, and send it to you and Marcia by sometime early next week.

David McNeal

EPA Region 4

404-562-9102

From: Marsh, Karen

Sent: Thursday, July 25, 2019 12:45 PM

To: McNeal, Dave <Mcneal.Dave@epa.gov>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: RE: Applicability of NSPS Subpart OOOOa to gas pipeline mainline valves

Hi again Dave,

Ex. 5 Deliberative Process (DP)

Happy to review any draft responses. Let me know if there's anything else you'd need from me.

Karen

Karen R. Marsh, PE

US EPA, OAQPS, Sectors Policies and Programs Division

Fuels and Incineration Group

109 TW Alexander Drive, Mail Code E143-05

Research Triangle Park, NC 27711

Direct: (919) 541-1065; email: marsh.karen@epa.gov

From: McNeal, Dave

Sent: Thursday, July 25, 2019 9:40 AM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: RE: Applicability of NSPS Subpart 0000a to gas pipeline mainline valves

INTERNAL DELIBERATIVE MATERIAL DO NOT RELEASE UNDER FOIA

This morning I received a call from Kinder Morgan asking about the status of their applicability determination request. I told them that it is still under review.

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Ex. 5 Deliberative Process (DP)

Ex. 4 CBI

David McNeal

EPA Region 4

404-562-9102

From: McNeal, Dave

Sent: Wednesday, July 24, 2019 2:56 PM

To: Marsh, Karen <Marsh.Karen@epa.gov>

Cc: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: FW: Applicability of NSPS Subpart 0000a to gas pipeline mainline valves

INTERNAL DELIBERATIVE MATERIAL DO NOT RELEASE UNDER FOIA

Karen,

I would like to get the OAQPS perspective on the NSPS Subpart 0000a applicability question posed by Kinder Morgan (KM) in the attached July 10 letter. The company's question is whether a mainline valve co-located with a compressor station is subject to the leak detection and repair requirements in Subpart 0000a. I have looked at Subpart 0000a and the preambles for the Federal Registers for proposal and promulgation of the rule,

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Ex. 5 Deliberative Process (DP)

David McNeal

EPA Region 4

404-562-9102

From: Mia, Marcia

Sent: Thursday, July 18, 2019 11:15 AM

To: McNeal, Dave <Mcneal.Dave@epa.gov>

Cc: Marsh, Karen <Marsh.Karen@epa.gov>

Subject: RE: Applicability of NSPS Subpart 0000a to gas pipeline mainline valves

Thanks Dave,

I am cc'ing Karen Marsh - the OAQPS contact for the fugitive portions of NSPS 0000a.

Ex. 5 Deliberative Process (DP)

Marcia B Mia

Air Branch

Office of Compliance

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U.S. Environmental Protection Agency

202-564-7042

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From: McNeal, Dave

Sent: Thursday, July 18, 2019 10:37 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>

Subject: Applicability of NSPS Subpart 0000a to gas pipeline mainline valves

Marcia,

We have received the attached applicability determination request for a Kinder Morgan (KM) owned compressor station in Thomaston, Georgia. KM is asking for a determination regarding whether a mainline valve (MLV) located within the fence line of the Thomaston Compressor Station (TCS) is subject to the equipment leak detection and repair (LDR) requirements in 40 CFR Part 60 Subpart 0000a (Standards of Performance for Crude Oil and Natural Gas Facilities for which Construction, Modification or Reconstruction Commenced After September 18, 2015).

The TCS has been in operation since 1963, and it became subject to Subpart 0000a when a new turbine was added at the site on March 31, 2017. During the initial LDR monitoring conducted at the TCS on August 21, 2017, MLV 29 was determined to be leaking. Attachment 5 to KM's applicability determination request provides details regarding several unsuccessful attempts to repair the valve since the leak was detected in August 2017.

After reviewing Subpart 0000a, KM believes that MLV 29 is not part of the compressor station affected facility covered by the rule, and the purpose of the company's July 10 letter was to seek a formal determination regarding the applicability of Subpart 0000a to MLV 29.

MLVs are used to segment a gas pipeline so that the it can be blown down as rapidly as possible without creating a hazard, and the distance between valves varies between 2.5 to 10 miles. The minimum distance between any two valves on a pipeline is mandated by Department of Transportation (DOT) regulations in 49 CFR Part 192. The required distance between valves depends primarily on the population density along the pipeline, and I have attached a Word file with the regulatory text that establishes the minimum distance between MLVs.

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If you know on an OAQPS contact that can help with this question, please let me know and/or forward a copy of my email to them. Bruce Moore was the OAQPS contact for Subpart 0000s, but he has apparently retired, and I don't know if OAQPS currently has a contact for NSPS Subpart 0000a questions.

David McNeal

EPA Region 4

404-562-9102